

MEMO ENDORSED

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September 24, 2021

BY ECF

Honorable Andrew L. Carter, Jr.
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, New York 10007

USDC SDNY
DOCUMENT
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Re: *United States v. Joseph Perlman*, 19-cr-531 (ALC)

Dear Judge Carter:

I represent Joseph Perlman in the above-captioned case and write with the consent of the Government to request an extension of Mr. Perlman's date of surrender, currently set for October, 1, 2021.

Mr. Perlman appeared before Your Honor for sentencing on Friday, December 6, 2019. Subsequently, Mr. Perlman was designated to serve his sentence at FPC Montgomery. Mr. Perlman's surrender date has been extended several times due to the risks posed to Mr. Perlman by the novel coronavirus 2019 ("COVID-19") and Mr. Perlman's serious medical condition. *See* ECF Nos. 21, 23, 45, and 48. Most recently, on May 27, 2021, Your Honor granted Mr. Perlman's request to adjourn his surrender date due to his need for ongoing treatment and medical attention following a [REDACTED] procedure that he had in March 2021. ECF No. 62.

* * *

On March 17, 2021, Mr. Perlman's [REDACTED] Dr. Mohammad Kooshkabadi, performed [REDACTED] This procedure was discussed in detail in Dr. Kooshkabadi's affidavit dated August 24, 2020. *See* First Kooshkabadi Affidavit, ECF No. 41, Exhibit A at ¶¶ 7, 15; *see also* Second Affidavit of Dr. Mohammad Kooshkabadi, ECF No. 60, Exhibit 2. This was the [REDACTED] that Mr. Perlman received to treat his [REDACTED] and to prevent a recurrence of [REDACTED] Second Kooshkabadi Affidavit at ¶¶ 7, 11.

As he explains in the attached affidavit ("Third Kooshkabadi Affidavit"), Dr. Kooshkabadi continues to treat Mr. Perlman and monitor him for post-[REDACTED] [REDACTED] Over the next three months, Mr. Perlman will have regular appointments with Dr. Kooshkabadi, while he scales back Mr. Perlman's [REDACTED]. Afterwards, he will require that Mr. Perlman wear a [REDACTED]

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2

[REDACTED], and confirm that his [REDACTED] is under control.
Third Kooshkabadi Affidavit at ¶ 14.

[REDACTED] Dr. Kooshkabadi will clear him to perform regular activities. Third Kooshkabadi Affidavit at ¶ 15. In light of Mr. Perlman's [REDACTED] and medical history, Dr. Kooshkabadi would be greatly concerned if he were unable to complete these post-operative procedures and monitoring. Third Kooshkabadi Affidavit at ¶ 15.

We respectfully request that Your Honor adjourn Mr. Perlman's surrender date to March 25, 2022. This adjournment would allow him the time he needs to heal from his procedure and complete his necessary medical treatment with Dr. Kooshkabadi—ensuring that serving his sentence does not jeopardize his health.

Respectfully submitted,


Sean Hecker

cc: (by email)

David Abramowicz and Michael McGinnis

Assistant United States Attorneys, Southern District of New York

Brandon Harper

United States Pretrial Services Officer, Northern District of Georgia

The application is **GRANTED**.

So Ordered.


9/28/21

Exhibit 1 Filed Under Seal

EXHIBIT 1